

**REMARKS**

Applicant respectfully requests reconsideration. Claims 1-30 and 32-41 were previously pending in this application. Claim 21 has been amended. As a result, claims 1-30 and 32-41 are pending for examination with claims 1, 11, 21 and 32 being independent claims. No new matter has been added.

**Rejection Under 35 U.S.C. §103**

Claims 1-20 and 41, including independent claims 1 and 11 are rejected based on Donohue (U.S. patent 6,199,204) and Parthesarathy (U.S. patent 6,353,926).

In the Response to Arguments section, the Examiner focuses on arguments that the references do not show an activity program. The Examiner then cites a passage of Donohue that purportedly shows an activity program.

However, that passage does not describe any component that could reasonably be interpreted as an “activity program” meeting all the limitations of claim 1. For example, claim 1 recites:

“an activity program adapted to implement a portion of a collaboration session on a first peer device of the plurality of peer devices, the activity program modifying a local data copy of a shared space in response to deltas generated as a result of user actions within the collaboration system at the first peer device and other peer devices of the plurality of peer devices, and the activity program generating a component update request in response to an action by a user within the collaboration session, the user action indicating a change to the shared space made with the component.”

This limitation requires both that the activity program: 1) implement a portion of a collaboration session and 2) generate a component update request in response to an action by a user within the collaboration session indicating a change to the shared space. The cited passages of Donohue do not describe a component that does either.

As understood based on the cite to column 7, lines 12-25 as teaching an activity program, the Office Action equates the “updater components” of Donohue with the activity program of the present application. However, the updater components of Donohue are described as providing a method for automating updating of computer programs (see, Abstract) – and not for implementing a portion of a collaboration session. Consequently, the updater components of Donohue does not satisfy the limitations of claim 1.

For example, claim 1 requires that the activity program modifies “a local data copy of a shared space in response to deltas generated as a result of user actions within the collaboration system at the first peer device and other peer devices of the plurality of peer devices.” The Office Action asserts that this limitation is met at col. 7, line 55 through col. 8, line 12. However, this passage describes “remote server systems” through which software vendors make updates available. The updater components do not maintain the remote server systems. Rather the software vendors do (see, e.g., col. 7, lines 61-62; col. 8, lines 31-32). Because the updater components do not maintain the remote server systems, it follows that the updaters do not maintain the remote server system in response to user input. To the contrary, the reference emphasizes automated action (see, e.g., Abstract).

It follows that, if the updater components do not modify the remote server system in response to any user actions, they do not modify it “in response to deltas generated as a result of user actions within the collaboration system at the first peer device and other peer devices of the plurality of peer devices,” as claimed.

Similarly, there is no reasonable interpretation of the reference under which an updater components is an “activity program generating a component update request in response to an action by a user within the collaboration session, the user action indicating a change to the shared space made with the component.” First, it should be noted that the Office Action cites no portion of Donohue that meets the limitation: “the user action indicating a change to the shared space made with the component.” Second, the passage of Donohue cited in the Office Action as generating a component update does not describe a component update request. In fact, Col. 5, lines 1-10 does not relate to user input within a session involving communication between updater components. Col. 5, lines 1-10 merely describes that a user of a machine can provide operating parameters for the

updater components on its machine. If, as seemingly asserted in the Office Action, interaction between updater components implements a collaboration session, col. 5, lines 1-10 does not describe action by a user within that collaboration session and Donohue does not describe an “activity program generating a component update request in response to an action by a user within the collaboration session,” as claimed.

Thus, for multiple reasons, Donohue does not teach “the activity program generating a component update request in response to an action by a user within the collaboration session, the user action indicating a change to the shared space made with the component,” as claimed.

Because the updater components of Donohue do not perform the functions recited in the claimed activity program, the references, even if combined, would not teach all limitations of claim 1.

Parthesarethay is not cited as teaching any of the limitations highlighted above that are not met by Donohue. Rather, Parthesarethay is only cited as teaching asynchronous retrieval of a file based on a URL. Accordingly, even if the references were combined, Parthesarethay would not cure the deficiencies of Donohue, and the rejection should be withdrawn.

Independent claim 11 is likewise rejected under 35 U.S.C. §103 based on Donohue and Parthesarethy. In rejecting claim 11, the Office Action cites the same passages of these references that are cited in connection with claim 1. For reasons that should be apparent from the foregoing discussion of the cited references in conjunction with claim 1, the references, whether considered alone or in combination, when properly interpreted do not meet all limitations of claim 11.

In addition, claim 11 recites limitations that distinguish over the cited references. For example, claim 11 recites “generating a component update request in response to receiving information above a component being used in a collaboration session involving the at least one other computer, the component update request identifying the component.” The Office Action seems to equate interactions between updater components with the collaboration session. However, the updates in Donohue do not relate to components being used for such collaboration. Nor is there any indication in Donohue that any update request would identify a “component being used in a collaboration session involving the at least one other computer,” as recited in the claim.

Furthermore, claim 11 recites that "the received information being generated dynamically while the collaboration system is in operation modify the shared space based on input of a plurality of users collaborating using the peer-to-peer collaboration system." Applicants respectfully submit that no part of Donohue, including passages that describe communication between updater components to update pre-requisite software, meets these limitations.

Parthesarathy is not cited to teach these elements. Accordingly, even if the references were combined, the combination would not meet the highlighted limitations, and Applicants respectfully request that the rejections of claims 1 and 11 be withdrawn.

Rejection Under 35 U.S.C. §103

Claims 21-30 and 32-41, including independent claims 21 and 32 are rejected based on Varma (U.S. patent 6,334,141) and Carley (U.S. patent 6,701,345). Applicants respectfully disagree with the interpretation of both Varma and Carley and respectfully traverse the rejection on the grounds that, even if the references were combined, the combination would not meet all limitations of the claims.

Unlike the peer-to-peer collaboration system described in the present application, Varma describes a collaboration system in which a workspace is maintained at a central location. Varma describes that, instead of single server, the workspace is maintained on a "distributed server," with the role of the central server being fulfilled by multiple servers. (see, e.g., Abstract and FIG. 1). Varma describes how updates are distributed to the multiple servers, with a specific focus on dividing a workspace into disjoint partitions that can be modified independently of each other (col. 3, lines 53-55). Thus, Varma at most describes modifying a shared space, but does not describe updating components used in modifying a shared spaced.

The Office Action asserts that Varma at col. 5, line 16 to col. 6, line 27 teaches the following limitation of independent claim 21:

program code for running a process that maintains a local copy of a shared space, the process being adapted to respond to input from the plurality of members and generates generate a request to update a component used in

modifying the local copy of the shared space, the request being generated in response to user input indicating use of the component

However, the cited passage of Varma describes a “workspace modification request” (col. 5, line 36). The passage describes that the workspace modification request is applied to affected partitions of the workspace (col. 5, line 46). Because the focus on Varma is on the distribution of the workspace modification request, not on its generation, this passage does not describe a component used in modifying the workspace. It follows, therefore, that the passage provides no relevant teaching of a request to update such a component. It follows further that the cited passage provides no relevant teaching of generating such an update request in response to user input indicating use of the component. Consequently, for multiple reasons, Varma does not meet at least the highlighted limitations of claim 21.

Carley does not cure these deficiencies of Varma. In fact, Carley is not cited as teaching any of these limitations. Rather, Carley is cited only as teaching receipt of URL information and asynchronously retrieving files from an identified location. Even if combined, Varma and Carley would not teach all limitations of claim 21, including the limitation highlighted above, and the references do not make a *prima facie* case of obviousness.

As a further reason that the combination of references does not make a *prima facie* case of obviousness, Carley does not teach downloading and installing a component as asserted in the Office Action. Col. 50, line 52 – col. 52 line 16 of Carley, cited in the Office Action as teaching this feature, relates to a development tools framework (col. 50, line 18). Carley relates to a data management system (col. 1, lines 1-10) and specifically seems to be directed to a database system in which multiple users attempt to alter the same data (col. 4, lines 40-45). In the context of Carley, the cited passage at col. 50, line 52 – col. 52 line 16, is describing tools used to develop such a database system and does not relate to the cited proposition of downloading and installing components.

Further, neither reference is cited as teaching limitations of claim 21, such as:

program code that extracts from the first file an indicia of a trusted supplier and obtains second location information of a second file, the second file containing a second component;

program code that uses the second location information to retrieve the second file;

program code to extract from the second file the second component and an indicia of a supplier of the second component; and

program code that selectively installs the second component when the indicia of the supplier is consistent with the indicia of a trusted supplier

Thus, for at least the foregoing reasons, the rejection of claim 21 should be withdrawn.

Independent claim 32 is rejected based on the same interpretation of Varma and Carley. Because the Office Action has not properly interpreted these references, the rejection of claim 32 should be withdrawn for reasons that should be apparent from the discussion of the references above.

For example, neither reference teaches the limitation of claim 32 that recites:

means for implementing a collaboration session for a user, the means for implementing adapted to maintain a local copy of a data space shared by a plurality of collaborating members in the collaboration session and to receive an indication of a component in use within the collaboration session involving the at least one other computer and to selectively generate an update request for the component based on the indication of use within the collaboration session;

Thus, for at least the foregoing reasons, the rejection of claim 32 should be withdrawn.

#### Comments on Dependent Claims

Each of the remaining claims depends, directly or indirectly, from one of the independent claims and therefore distinguishes over the cited references for at least the same reasons as the

independent claims. Further, the dependent claims recite limitations that further distinguish over the references, providing additional reasons that the dependent claims should be allowed.

For example, claim 2 recites that an activity program on a first peer device generates a component update request based on action by the user with a second activity program on a second peer device. Claim 8, which is dependent on claim 2, further recites that the update request is generated "in response to receiving an invitation from a user of the first device to join the collaboration session."

As another example of dependent limitations that further distinguish over the references, claim 7 recites in addition to the component manager recited in claim 1, "a system component manager" and "a system component installer" as recited in claim 7, these components may be used when the component to be updated may be required for operation of the claimed apparatus.

Claim 9 further distinguishes over the references by reciting that the change for which the component update request is generated "comprises instantiation of a template for the tool."

Because each of the dependent claims depends from a base claim that is believed to be in condition for allowance, Applicants believe that it is unnecessary at this time to extensively argue the allowability of all of the dependent claims individually. However, Applicants do not necessarily concur with the interpretation of the dependent claims as set forth in the Office Action, nor do the Applicants concur that the basis for the rejection of any of the dependent claims is proper. Therefore, Applicants reserve the right to specifically address the patentability of the dependent claims in the future.

**CONCLUSION**

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, the Director is hereby authorized to charge any deficiency or credit any overpayment in the fees filed, asserted to be filed, or which should have been filed herewith to our Deposit Account No. 23/2825, under Docket No. M1103.70273US00.

Dated:

*January 16, 2009*

Respectfully submitted,

*[Signature]*

Edmund J. Walsh  
Registration No.: 32,950  
WOLF, GREENFIELD & SACKS, P.C.  
Federal Reserve Plaza  
600 Atlantic Avenue  
Boston, Massachusetts 02210-2206  
617.646.8000